

1 Martin A. Little, Esq., NV Bar No. 7067  
 2 **Howard & Howard Attorneys PLLC**  
 3 3800 Howard Hughes Pkwy., Ste. 1000  
 4 Las Vegas, NV 89169  
 5 Telephone: (702) 257-1483  
 Facsimile: (702) 567-1568  
 E-Mail: [mal@h2law.com](mailto:mal@h2law.com)  
*Attorney for Plaintiff*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 MOTUS, LLC, a Nevada limited liability  
 company,

Civil Case No. 2:24-cv-02317-JAD-EJY

9 Plaintiff,  
 10 v.  
 11 CITY OF HENDERSON, a municipal  
 12 corporation and a political subdivision of the  
 13 State of Nevada; CITY OF HENDERSON  
 14 REDEVELOPMENT AGENCY, a State of  
 15 Nevada public body corporate and politic;  
 DOES I through X, inclusive; and ROE  
 16 CORPORATIONS I though X, inclusive,  
 Defendants.

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME**

**(First Request)**

ECF No. 13

17 Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and LR IA 6-1, Plaintiff  
 18 Motus, LLC (“Plaintiff”) and Defendants City of Henderson and City of Henderson  
 19 Redevelopment Agency (collectively “Defendants”), hereby agree and stipulate, as follows:

20 1. Defendants filed their pending Motion to Dismiss Portions of Plaintiff’s First  
 21 Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) on January 28, 2025 (ECF No. 11) (the  
 22 “Motion”).

23 2. One of Plaintiff’s owners is overseas, and Plaintiff’s counsel is attempting to  
 24 communicate with Plaintiff’s ownership to respond to the Motion. The delay in communication is  
 25 making it difficult for Plaintiff and its counsel to prepare a sufficient response to the Motion.

26 3. Therefore, Plaintiff has requested, and Defendants have agreed, to extend the due  
 27 date for Plaintiff’s response to the Motion by two weeks, from February 11, 2025, to February 25,  
 28 2025.

1       4. Additionally, Plaintiff and Defendants have agreed to move the following dates and  
 2 deadlines out of necessity:

3           a. 3/10/25 at 2:30 p.m. – hearing on Defendants' Motion  
 4           b. 3/14/25 – Discovery Plan and Scheduling Order

5       5. The parties hereby request that the Court continue those dates and deadlines for two  
 6 weeks or, in the case of the hearing on the Motion, at a time convenient for the Court at least two  
 7 weeks after March 10, 2025.

8       6. The parties agree that the foregoing constitutes good cause and respectfully request  
 9 the Court's permission to extend the briefing schedule.

10     **IT IS SO AGREED AND STIPULATED:**

11      HOWARD & HOWARD ATTORNEYS  
 12      PLLC

13      /s/ Martin A. Little  
 14      Martin A. Little, Esq.  
 15      Nevada Bar No. 7067  
 16      3800 Howard Hughes Parkway, Ste. 1000  
 17      Las Vegas, NV 89169  
 18      Tel. (702) 257-1483  
 19      [MAL@H2Law.com](mailto:MAL@H2Law.com)

20      *Attorneys for Plaintiff*

21      HENDERSON CITY ATTORNEY'S OFFICE

22      /s/ Wade B. Gochnour  
 23      City Attorney Nicholas G. Vaskov  
 24      Nevada Bar No. 9289  
 25      Assistant City Attorney Wade B. Gochnour  
 26      Nevada Bar No. 6314  
 27      240 Water Street, MSC 144  
 28      Henderson, NV 89015  
 29      Tel. (702) 3267-1200  
 30      [Wade.Gochnour@CityofHenderson.com](mailto:Wade.Gochnour@CityofHenderson.com)

31      *Attorneys for Defendants*

32      **ORDER**

33      Based on the parties' stipulation [ECF No. 13] and good cause appearing, IT IS HEREBY  
 34      ORDERED that the deadline to file the proposed discovery plan and scheduling order is  
 35      extended to 3/28/2025, the deadline for response to the motion to dismiss [ECF No. 11] is  
 36      extended to 2/25/25, and the hearing on the motion to dismiss is CONTINUED to Monday,  
 37      3/31/2025 at 1:30 p.m. in LV Courtroom 6D before Judge Jennifer A. Dorsey.

38        
 39      U.S. District Judge Jennifer A. Dorsey  
 40      Dated: February 11, 2025